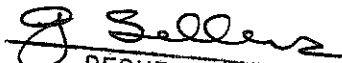


IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE GEORGIA

2011 OCT -5 PM 2:06


DEPUTY CLERK

SUSANNA SCHAEFER,
Plaintiff,

v.

ATHENS DOWNTOWN
DEVELOPMENT AUTHORITY,

Defendant,

*

*

*

*

*

*

*

*

*

Civil Action

File No: 3:10-cv-00028-CDL

**PLAINTIFF REQUEST FOR VOIR DIRE QUESTIONS OF PROSPECTIVE
JURORS**

Now comes the defendant in the above-captioned matter and requests that the Court ask the following questions of prospective jurors in addition to the questions which the Court ordinarily asks:

PROPOSED VOIR DIRE QUESTIONS

Ladies and gentlemen, it is extremely important to both the Plaintiff and the Defendant that the jury seated in this case be fair and impartial. Many people have had experiences in their lives which influence the way they think about certain things. These experiences can affect the way a prospective juror will act in a case and whether that prospective juror can accept and apply the law as it is to a certain factual situation. A person may be qualified to sit as a juror in one kind of case but not in another.

We are now about to pick a jury in this case. It is important that you each answer the following questions truthfully and accurately.

Please indicate if you respond affirmatively to any question.

1. Have you heard anything about this case from any source whatsoever?
 - a. If so, what have you heard?
 - b. Has anything that you have heard caused you to form an opinion about this case?
 - c. If so, what is that opinion?

2. Are you acquainted in any way with the Defendant, who is the Athens Downtown Development Authority, known as the ADDA for short, or with any associations related with the ADDA, such as the Downtown Athens Business Association, or do you know any people associated with those associations?
 - a. If so, what is your relationship with the associations or with the witnesses or people associated with the ADDA or with those associations of the ADDA?

3. Do you have any association with The College Avenue Parking Deck, such as do you know anyone who is working or formerly worked at The College Avenue Parking Deck in Athens, or do you or anyone in your family have monthly parking privileges at the College Avenue Parking Deck in Athens or pay to have regular parking privileges with the ADDA?
 - a. If so, what is your relationship with the business or the people related to The College Avenue Parking Deck in Athens?

4. Are you acquainted in any way with past or current employees of Sizemore Security Company?
 - a. If so, what is your relationship with the business or the people related to Sizemore Security Services?

5. Is there anything about the nature of this case which you think would make it difficult for you to try the issues fairly and impartially without any prejudice or bias?

6. If you were to put yourself in the Defendant's place, is there any reason why you would not want someone like yourself to sit on this jury?

a. If so, why not?

7. If you were to put yourself in the Plaintiff's place, is there any reason why you would not want someone like yourself to sit on this jury?

a. If so, why not?

8. What do you do for a living?

9. Did you graduate from a four year college?

10. Have you ever thought you, or a person close to you, to be sexually harassed?

a. If so, how did you feel about it?

11. Do you think the government needs to more strongly enforce laws to protect women?

12. Have you, or a person close to you, ever been fired?

a. If so, how did you feel about it?

13. Have you ever felt yourself to be unfairly treated at the workplace?

a. If so, what did you do about it?

14. Have you, or a person close to you, ever been bullied?

a. If so, how did you feel about it?

15. Have you, or a person close to you, ever brought forth, or seriously considered bringing forth, a lawsuit?

a. If so, tell us about it.

16. If you felt you were seriously unjustly treated, do you think its better not to go to the courts to remedy the situation, but probably better to just move on and forget it?

a. Tell us why you feel this way.

17. Do you like to read books magazines and newspapers?

a. Do you like to regularly read newspapers besides your local newspaper?

b. Which one or ones?

18. Do you believe child support and alimony enforcement need to be increased?

a. If not, tell us about it.

19. If the evidence justifies it, would you feel comfortable awarding a substantial monetary amount through the courts to compensate someone for the conditions they had to endure because of the wrongful actions of another party?

20. Do you feel the government is too unnecessarily intrusive in setting standards for businesses?

21. If you feel someone is being treated unjustly, would you think that getting involved would probably just make matters worse?

A. Tell us why you feel that way.

22. Do you feel men tend to be physically abused as much by women as women are by men?

23. Do you think people in positions of authority and respect, are as likely to lie to escape the consequences of their actions as are their subordinates?

a. If so, tell us about it.

24. Do you sometimes or often times choose to go see a romantic movie at the movie theater?

25. What do you think about being politically correct?

26. Do you believe that there is a difference between some dirty talk and inappropriate sexual behavior?

a. Where is that line for you?

27. Do you think that too many people are just too sensitive to off-color jokes?

28. Do you consider yourself the type to try and put together some facts to try and figure out when people are not telling the truth?

a. If so tell us about it.

29. Would you consider yourself a person who people consider to be too opinionated?

30. Do you feel that if your friend doesn't like someone, you probably shouldn't like that person either?

a. If not, why not?

31. Do you believe that you are the type to speak up to management when you feel you or others are not being fairly treated?

32. Do you feel that it's fair that a person without financial means has a harder time pursuing justice in the courts?

33. Are you a person who often gets involved in local Athens events and politics?

a. If so, tell us about it.

34. Did you grow up in Athens or live in Athens for a long time?

35. Do you aspire to be a well-known and respected member of the community?

36. Do you feel that women often tend to act in subtle ways to attract male attention?

Thank you for your help.

This ⁵~~4~~th day of October, 2011,

Respectfully Submitted,

By: Sue Schaefer

Susanna Schaefer

Susanna706@msn.com
247 Sunset Terrace
Athens, GA 30606
Ph: 706-543-5497

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

SUSANNA SCHAEFER,
Plaintiff,

v.

ATHENS DOWNTOWN
DEVELOPMENT AUTHORITY,

Defendant,

*
* Civil Action
* File No: 3:10-cv-00028-CDL
*
*
*
*
*

CERTIFICATE OF SERVICE

This is to certify that I filed this **PLAINTIFF'S REQUEST FOR VOIR DIRE
QUESTIONS OF PROSPECTIVE JURORS** with the Clerk of Court which will
automatically send e-mail notification of such filing to the following attorneys of record.

GOODMAN MCGUFFEY LINDSEY & JOHNSON, LLP
Attorneys for Defendant Athens Downtown Development Authority

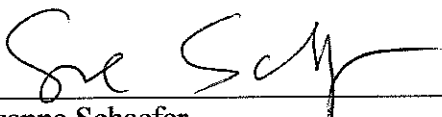
ROBERT A. LUSKIN
rluskin@gmlj.com
GA State Bar No.: 004383

KRISTY P. KRAMP
kkramp@gmlj.com
GA State Bar No.: 155074

Address:
3340 Peachtree Road NE, Suite 2100
Atlanta, GA 30326-1084
Phone: (404) 264-1500
Fax: (404) 264-1737

This 5th day of October, 2011,

Respectfully Submitted,

By: 
Susanna Schaefer

Susanna706@msn.com
247 Sunset Terrace
Athens, GA 30606
Phone: 706-543-5497